## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DEMETRA LEVINS,	§	
	§	
PLAINTIFF,	§	
	§	
V.	§	C.A. No., 4:20-cv-1053
	§	
SPRINT SAND & CLAY, LLC,	§	
	§	
DEFENDANT,	§	JURY TRIAL DEMANDED

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## **DEFENDANT'S NOTICE OF DEPOSITION OF DEMETRA LEVINS**

To: Demetra Levins, by and through her attorney of record, Chukwudi Egbuono, Law Office of Chukwudi Egbuono, 4141 Southwest Freeway, Suite #390, Houston, Texas, 77027 <a href="mailto:chuck@celawoffice.com">chuck@celawoffice.com</a>

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Defendant, Sprint Sand & Clay, LLC will undertake take the oral deposition of Demetra "Michelle" Levins, Plaintiff, on Friday, December 11, 2020, commencing at 10:00am. The deposition will be conducted via ZOOM link, with the Plaintiff located at her home or the office of her attorney and will continue day to day until completed. The deposition will be stenographically recorded by a certified court reporter and videographer of Hanna & Hanna, located at 4545 Post Oak Place Drive, Houston, Texas, 77027, 713-840-8484. All parties are invited to attend and to examine the witness as proscribed by the FEDERAL RULES OF CIVIL PROCEDURE. The deposition may be used for discovery purposes, offered into evidence at the

trial of this cause and for any other purpose as may be permitted pursuant to the FEDERAL RULES OF CIVIL PROCEDURE.

The witness is respectfully requested to provide a government issued identification card such as a Texas Driver's License for purposes of identity verification by the stenographer.

Respectfully submitted,

**BINGHAM MANN HOUSE** 

By: <u>/s/ Jennifer L. House</u> Jennifer L. House SBN: 16519200 FBN: 57338 4500 Yoakum Boulevard

Houston, Texas, 77006 Tele: 713-357-9860 Fax: 713-559-3014

Email: <u>ihouse@bmh-law.com</u>

ATTORNEY FOR DEFENDANT,

SPRINT SAND & CLAY, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2020, a true and correct copy of the foregoing instrument has been served on opposing counsel of record electronically via CM/ECF for the United States District Court for the Southern District of Texas, Houston Division, in accordance with the federal Rules of Civil Procedure and any applicable Local Rules

## VIA CM/ECF:

Chukwudi Egbuonu Law Office of Chukwudi Egbuonu 4141 Southwest Freeway, Suite #390 Houston, Texas, 77027 <u>chuck@celawoffice.com</u> ATTORNEY FOR PLAINTIFF, DEMETRAS LEVINS